REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested. Claims 1-9 are pending, Claims 1, 5 and 6 having been amended and Claims 7-9 added by way of the present amendment. The amendments to Claims 1, 5 and 6 find support in the present specification, for example at page 16, lines 10-20, and therefore no new matter is added. Support for Claims 7-9 is found in Claims 1 and 2 and thus no new matter is added.

In the outstanding Office Action, Claim 5 was rejected under 35 U.S.C. § 101; and Claims 1-6 were rejected as being unpatentable over Callahan (U.S. Publication No. 2002/015723) in view of Sheynblat (U.S. Patent No. 6,677,894, hereinafter Sheynblat).

In reply, Claim 5 has been amended to define a computer-implemented method that among other things, includes a step of storing structured documents in a computer readable memory for subsequent retrieval. This computer-implemented method also includes a step of acquiring distribution rule information sent from a remote source when data contents are set to a distribution mechanism. It is believed this amendment to Claim 5 clearly directs it to a method to be executed on a computer that produces a tangible result in the form of a structured document saved in a computer readable memory for subsequent retrieval. Thus, it is believed that Claim 5 complies with 35 U.S.C. § 101. Claim 8 is similarly statutory subject matter as it is directed toward interaction on a computer and outputting results to a distribution server.

Likewise, Claim 6 has been amended to define a computer readable medium having computer program instructions recorded thereon, consistent with 35 U.S.C. § 101.

Before turning to the obviousness rejections, a brief recapitulation of the invention defined by amended Claim 1, for example is in order. Amended Claim 1 is directed to an apparatus for converting a structured document. The apparatus includes acquisition means

for acquiring distribution rule information sent from a remote source when data contents are sent to the acquisition means. The distribution rule information includes a description of the distribution rules of the contents. The receiver side situation information is also described. The apparatus also includes generation means for generating the conversion rule based on the distribution rule information in the receiver side situation information acquired by the acquisition means. The apparatus also includes conversion means for converting the structured documents based on the conversion rule information generated by the generation means. An advantage with this apparatus is that by sending the distribution rule information from a remote source when the data contents are sent to the acquisition means, allows for the distribution rule information to be updated separately from the contents of the document itself.

The outstanding Office Action asserts that Callahan discloses all the features of amended Claim 1 except for the feature of the converting rules being based upon the distribution rule information and the receiver side situation information, but attempts to cure this deficiency by citing Sheynblat which explains that information may be sent based on distribution rules that include a user's location and the like. Applicants respectfully traverse this assertion.

Callahan is directed to a system and method for using a Semantic Firewall to transform client requests into forms that are appropriate for the role and level of access of the client. As seen in Figure 3 for example, a Semantic Firewall 312 is disposed between a client 308A an enterprise server 304, which relies on a secure database 306 to extract secure information perhaps regarding the client or information regarding the client's request. When the client sends a request, the Semantic Firewall 312 serves a function of login-based access control of information used to fill out web-based forms (paragraph [0054]). This form-fill is essentially a "filtering" action on the profile information of a person which is stored in a

secured database 306. The Semantic Firewall serves to check the integrity of the information regarding profiles of information of the client [0054]. Multiple stage filtering can be performed so that different attributes that are tagged to a particular record can be shown or hidden in subsequent processing. For example, depending on a particular patient, only a particular physician of the patient can view a medical test record for that particular patient [0081]. By performing the multiple stage processing and relying on the secured database 306, the semantic firewall limits the access a client has to data without having to rely on the application to limit the access.

Comparing amended Claim 1 with Callahan, amended Claim 1 is directed to an acquisition means that acquires distribution rule information sent from a remote source when the data contents are sent to the acquisition means. Callahan does not have this feature, as it relies on a particular client request to start the process [0052], and a reliance on a subsequent access to the secure database 306 after the request is made. Callahan does not describe a mechanism that acquires the distribution rule information and the receiver side situation information when the data contents are sent to the acquisition means.

An advantage with the claimed approach that is not offered by Callahan, is the independence of the transmission and reception of the distribution rule information and receiver side situation information that is not contemplated in the Semantic Firewall structure 312 in Callahan. Rather, Callahan requires a multiple step process in which a particular client request starts an initiation logon process, that is activated at the Semantic Firewall 312 that ultimately requires interaction with a secure database 306 and subsequent actions before processing on the enterprise server 304 may be performed. In addition, Applicants agree that the claimed generation means which generates the conversion rule on the basis of the distribution rule information and receiver side situation information is something that is not taught or suggested in Callahan.

The outstanding Office Action asserts that the motivation for combining Sheynblat with Callahan is that it would have allowed for the inclusion of targeted marketing billing etc. based on a customer's location (citing Sheynblat, column 20, lines 26-31). However, even if this were the case, any suggestion that Sheynblat would teach or suggest the sending of distribution rule information and receiver side situation information when the data contents are sent to the acquisition means, would render Callahan unfit for its intended purpose. In particular, Callahan relies on the insertion of a Semantic Firewall 312 between a client and an enterprise server 304. The Semantic Firewall 312 requires a data exchange with a secure database 306 in order to obtain relevant client information. Therefore, even if Sheynblat could be combined with Callahan in any reasonable manner, the combination would not teach or suggest the acquisition means, as presently claimed.

Therefore, it is respectfully submitted that amended Claim 1 patentably defines over Callahan in view of Sheynblat. Although Claims 2-6 are of differing statutory class and/or scope, it is respectfully submitted that these claims also patentably define over Callahan in view of Sheynblat for at least the same reasons as discussed above with regard to amended Claim 1.

With regard to Claims 2 and 7, Applicants make the following additional observations.

According to Callahan, in filtering XBL file, the following steps are performed:

Step 1: Receiving XML file to be converted and generating an intermediate annotated file from the received XML file, (converting the received XML file into the intermediate annotated file), on the basis of CLIPS rule (corresponding to the claimed "distribution rule information");

Step 2: Generating XSLT (corresponding conversion rule information) from user information (corresponding to "receiver side situation information"); and

Step 3: Converting the intermediate annotated file (similar to XML file format) using the generated XSLT.

That is, in Callahan, the conversion of XML file should be performed twice (Steps 1 and 3, above).

On the contrary, support for the claims occurs with only the following two steps.

Step A: Generating XSLT on the basis of the receiver side situation information and the distribution rule information; and

Step B: Converting XML file on the basis of the generated XSLT. That is, the conversion of "XML" file is performed only time (Step B, above).

Processing cost in the conversion of XML file depends on the number of nodes included in the XML file. Assuming whether or not a part of contents to be distributed should be deleted in accordance with role etc. of user who should receive the content since XML file including the content to be distributed is general data which is different from the distribution rule information and the receiver side situation information, it is generally different to limit the number of nodes to be included in the XML file. Therefore, in view of the use of a general system, it is preferable to decrease the processing cost in the conversion of the XML file which depends on the number of the nodes included in the XML file. That is, since the number of conversions of the XML in the present invention is half of the number of conversions of the XML in Callahan, the processing cost in the conversion in the present invention is remarkably smaller than that in Callahan.

Consequently, it is respectfully submitted that Claims 1-9 as amended define statutory subject matter, and are patentably distinguishing over the asserted prior art. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of this application is therefore requested.

Respectfully submitted,

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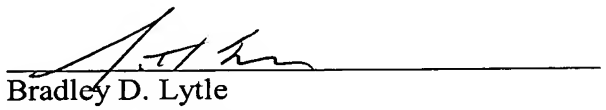

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